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February 27, 2015

Via Federal Express

Tameka Beckford-Young
Legal Counsel
Kawasaki Rail Car, Inc.
29 Wells Ave., Building 4
Yonkers, NY 10701

Re: Kawasaki's Infringement of U.S. Patent No. 6,700,602 (Blair)

Dear Ms. Beckford-Young:

We represent Scott Blair, the inventor and owner of U.S. Patent No. 6,700,602 ("the '602 patent") entitled "Subway TV Media System." The claims of the '602 patent cover implementations of subway cars with interior video screens.

In October 2010, we contacted Kawasaki to notify the company that at least its R160 rail car products (manufactured for use in the New York City subway system) and its PA-5 rail cars (manufactured for use in the Port Authority Trans-Hudson ("PATH") system) infringe the '602 patent. Kawasaki did not deny infringement of Mr. Blair's patent. Rather, it contended that it did not require a license because, in Kawasaki's view, the '602 patent claims were invalid in view of four Japanese patent or patent applications.

The United States Patent and Trademark Office ("USPTO") has since reexamined Mr. Blair's patent in view of the four Japanese references identified by Kawasaki. Earlier this year, and contrary to Kawasaki's assertions, the USPTO confirmed the patentability of the original independent claim of the '602 patent, as well as nearly two dozen additional claims. A copy of the '602 patent and the reexamination certificate is enclosed for your reference.

In view of the USPTO's recent confirmation of the patentability of the '602 patent inventions, we would like to arrange a meeting with representatives of Kawasaki as soon as possible to discuss an amicable resolution. Such a resolution could involve a licensing arrangement governing Kawasaki's use of Mr. Blair's inventions. Alternatively, Mr. Blair is willing to discuss terms under which Kawasaki could acquire Mr. Blair's patent rights, including the right to practice the claimed inventions and enforce the patent against other infringing parties—such as two of Kawasaki's competitors, Bombardier Transportation and Alstom Transportation.

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In our prior meetings, representatives for Kawasaki were accompanied by outside counsel (Stephen Manetta of Chadbourne & Parke LLP). We understand that Mr. Manetta has moved on to another position and no longer represents Kawasaki. Please contact me—or, alternatively, please send me contact information for any counsel you have retained in connection with this matter—so that we can arrange a meeting to discuss the '602 patent and resolution terms. I can be reached at (212) 351-3405 or at amodi@desmaraisllp.com.

Very truly yours,



Ameet A. Modi

Enclosures (2)